



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

SHARI MEGHREBLIAN
COMMISSIONER

BILL HASLAM
GOVERNOR

June 13, 2018

Via Electronic Mail to wdwhite0@tva.gov

Attn: W. Douglas White, NEPA Specialist
Tennessee Valley Authority
400 West Summit Hill Drive,
Knoxville, TN 37902

Dear Mr. White:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Tennessee Valley Authority (TVA) Draft Environmental Assessment (EA) for the *Rock Island State Park Recreation Easement*. TVA is considering a request from TDEC for a 40-year term recreation easement over 367 acres of TVA-managed public lands for the purposes of public recreation, including up to 5 acres for commercial recreation. Since 1971, the lands have been managed by TDEC in conjunction with its management of the adjacent Rock Island State Park. The land is located on Great Falls Reservoir, and along the Caney Fork River and Collins River in Warren and White Counties, Tennessee.

Actions considered in detail within the Draft EA include:

- **Alternative A – No Action Alternative** – Under the No Action Alternative, the area would continue to be managed by TDEC under an existing license agreement. The same or a similar level of public recreation opportunities would continue for all existing facilities within the licensed area, as stated within the existing license agreement. There would be no renovation or maintenance of the historic mill and associated development. The highway segment would remain in its current alignment.
- **Alternative B – Proposed Action Alternative** – Under this alternative, TVA would enter into a 40-year agreement with TDEC to manage 367-acres of TVA-managed public lands in conjunction with TDEC's management of the Rock Island State Park. Under the agreement, TDEC would manage the TVA lands and be responsible for maintenance actions on existing facilities. TVA would permit TDEC to restore the historic Great Falls Cotton Mill for use as a commercial facility and access improvements at the mill site would be implemented (e.g., parking area, sidewalks). The agreement would allow for commercial recreation within five-acres surrounding the mill location. In addition, a segment of the state highway (SR 287) would be relocated to move the highway away from the historic mill location for better development of the property and to improve safety for drivers and for pedestrians visiting the area. The state highway proposal would affect approximately 15 acres of vegetated lands just south of the mill location and would require TVA to issue a separate permanent road easement to the State of Tennessee Department of Transportation (TDOT). This alternative is preferred by TVA.

TDEC has reviewed the Draft EA and determined that it has no additional comments regarding the preferred action or alternative at this time. TDEC appreciates the opportunity to comment on this Draft EA. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,

A handwritten signature in blue ink that reads "Kendra Abkowitz". The signature is fluid and cursive, with the first name "Kendra" and last name "Abkowitz" clearly legible.

Kendra Abkowitz, PhD
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Tennessee Department of Environment and Conservation
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cc: Bill Avant, TDEC, TSP
Tom Moss, TDEC, DWR
Karen Stevenson, TDEC, OGC
Stephanie Williams, TDEC, DNA